

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

IN RE: LOESTRIN 24 FE ANTITRUST
LITIGATION

THIS DOCUMENT RELATES TO:
All End-Payor Plaintiff Actions

MDL No. 2472

Master File No. 1:13-md-2472-WES-PAS

**STIPULATION AND [PROPOSED] ORDER REGARDING END-PAYOR
PLAINTIFFS' WASHINGTON AND WYOMING UNJUST ENRICHMENT CLAIMS
UNDER STATE LAW**

WHEREAS, in its Memorandum of Decision on Class Certification and Order Regarding Motions to Exclude Certain Expert Opinions and Defendants' Renewed Motion to Dismiss (Oct. 17, 2019), ECF No. 1274 ("Order"), this Court dismissed certain of the End-Payor Plaintiffs' ("EPPs") unjust enrichment claims;

WHEREAS, Defendants and EPPs have met and conferred and agree that the Court's reasoning also applies to EPPs' unjust-enrichment claims under the laws of Washington and Wyoming; and

WHEREAS, EPPs preserve all rights to challenge the Court's ruling on appeal.

NOW, THEREFORE, it is hereby stipulated by and between the undersigned parties through their respective counsel, as follows:

1. The EPPs' unjust enrichment claims under the state laws of Washington and Wyoming are hereby dismissed with prejudice.
2. Nothing in this stipulation and order shall be construed as a waiver of EPPs' right to contest this Court's ruling with respect to EPPs' unjust-enrichment claims, including their claims under the laws of Washington and Wyoming.

The Parties respectfully request that the Court enter an order embodying the terms of their joint stipulation.

Dated: December 18, 2019

Respectfully submitted,

/s/ Nicole J. Benjamin

Nicole J. Benjamin (#7540)
John A. Tarantino (#2586)
ADLER POLLOCK & SHEEHAN P.C.
One Citizens Plaza, 8th Floor
Providence, RI 02903-1345
Telephone: (401) 274-7200
Facsimile: (401) 751-0604
nbenjamin@apslaw.com
jtarantino@apslaw.com

/s/ Steve D. Shadowen

Sharon K. Robertson
Donna M. Evans
COHEN MILSTEIN SELLERS & TOLL PLLC
88 Pine Street, 14th Floor
New York, NY 10005
Tel: (212) 838-7797
Fax: (212) 838-7745
srobertson@cohenmilstein.com
devans@cohenmilstein.com

Lauren M. Papenhausen (PHV)
Katherine Dyson (PHV)
WHITE & CASE LLP
75 State Street, Floor 24
Boston, MA 02109
Telephone: (617) 979-9300
Facsimile: (617) 979-9301
kate.dyson@whitecase.com
lauren.papenophausen@whitecase.com

Robert A. Braun
COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Avenue, Suite 500
Washington, DC 20002
Tel: (212) 408-4600
rbraun@cohenmilstein.com

Robert A. Milne (PHV)
Jack E. Pace III (PHV)
Michael J. Gallagher (PHV)
Alison Hanstead (PHV)
Michael E. Hamburger (PHV)
WHITE & CASE LLP
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
rmilne@whitecase.com
jpace@whitecase.com
ahanstead@whitecase.com
mgallagher@whitecase.com
mhamburger@whitecase.com

Steve D. Shadowen
Matthew C. Weiner
HILLIARD & SHADOWEN LLP
1135 W. 6th Street, Suite 125
Austin, TX 78703
Tel: (855) 344-3298
steve@hilliardshadowenlaw.com
matt@hilliardshadowenlaw.com

Marvin A. Miller
Lori Fanning
MILLER LAW LLC
115 South LaSalle Street, Suite 2910
Chicago, IL 60603
Tel: (312) 332-3400
mmiller@millerlawllc.com
lfanning@millerlawllc.com

Christopher M. Curran (PHV)
J. Mark Gidley (PHV)
Peter J. Carney (PHV)

Michael M. Buchman
Michelle Clerkin
MOTLEY RICE LLC
777 Third Avenue, 27th Floor

WHITE & CASE LLP 701
Thirteenth Street, NW
Washington, DC 20005
Telephone: (202) 626-3600
Facsimile: (202) 639-9355
ccurran@whitecase.com
mgidley@whitecase.com
pcarney@whitecase.com

*Attorneys for Warner Chilcott Co., LLC f/k/a
Warner Chilcott Co., Inc., Warner Chilcott
(US), LLC, Warner Chilcott Sales (US), LLC,
Warner Chilcott plc n/k/a Allergan WC Ireland
Holdings Ltd., Warner Chilcott Holdings Co.
III, Ltd., Warner Chilcott Corp., Warner
Chilcott Laboratories Ireland Limited, Watson
Laboratories, Inc., and Watson
Pharmaceuticals, Inc.*

New York, NY 10017
Tel: (212) 577-0050
Fax: (212) 577-0054
mbuchman@motleyrice.com
mclerkin@motleyrice.com

Co-Lead Counsel for the End-Payor Class

Robert J. McConnell
MOTLEY RICE LLC
321 South Main Street, Second Floor
Providence, R.I. 02903
Tel: (401) 457-7700
bmccConnell@motleyrice.com

Liaison Counsel for the End-Payor Class

SO ORDERED

CERTIFICATE OF SERVICE

I, Nicole J. Benjamin, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's CM/ECF system. Those attorneys who are registered CM/ECF users may access these filings, and notice of these filings will be sent to those parties by operation of the CM/ECF system.

Dated: December 18, 2019

/s/ Nicole J. Benjamin
Nicole J. Benjamin